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MCDERMOTT, WILL & EMERY

January 25, 2001

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA MESSENGER

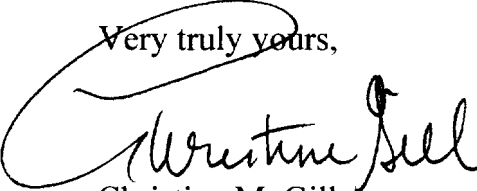
Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20554

Re: **Erratum to Reply Comments of Southern LINC®;
CC Docket No. 94-102**

Dear Ms. Salas:

On January 22, 2001, Southern LINC® filed Reply Comments in regard to Nextel Communications, Inc.'s request for a waiver of the E911 Phase II implementation deadline in the above-referenced proceeding. The Reply Comments contained an error on Page 5 (footnote 12). We ask that the attached, corrected page 5 replace the original page that was filed on January 22, 2001. Please do not hesitate to contact us if you have any questions on this matter.

Very truly yours,



Christine M. Gill

Enclosure

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overall policy on an individual basis."¹⁰ Conditioning the grant of the rule waiver on Nextel's agreement to allow automatic roaming by customers of other iDEN carriers would clearly advance the underlying purpose of the Commission's E-911 rules as the ability to roam would allow these customers to benefit more fully from E911 services. Additionally, if the Commission were to grant the waiver without imposing the roaming agreement condition, the Commission in effect would be undermining its own E911 initiatives by preventing the realization of a "nationwide, seamless communications infrastructure for emergency services."

This automatic roaming agreement is vital to Southern's SMR customers to allow them to use their phones for 911 calls even when outside of Southern's regional coverage area. The importance of roaming to Southern's customers is demonstrated in the attached letters: one from a Mississippi school district and another from a large medical transportation company which provides critical public safety service in Mississippi and Louisiana.¹¹ Without the ability to roam, it is not possible for the many iDEN customers to make even basic 911 calls outside of their home carrier's coverage area.¹² A roaming agreement between iDEN carriers, however, could make this possible. Not only does this situation raise serious considerations regarding human safety, it is directly contrary to the

¹⁰ *In the Matter of Implementation of the Subscriber Carrier Selection Changes Provisions of the Telecommunications Act of 1996; United-KUC, Inc. Petition for Waiver*, CC Docket No. 94-129, Order, DA 00-2735, ¶ 4 (released Dec. 5, 2000).

¹¹ See letters from American Medical Response and Harrison County School District attached.

¹² For example, Southern customer handsets manufactured before 1999 do not have Nextel's control channels in the unit "Band Map." Therefore the unit cannot transmit on the appropriate control channel to activate a 911 call when in a Nextel coverage area. Units manufactured after 1999 do have "Band Maps" containing both Southern and Nextel control channels. However, a roaming agreement is needed for the carriers to work out technical issues when customers are making calls in areas where *both* Nextel and Southern have coverage. Otherwise activating the ability to make a 911 call could result in the customer inadvertently "roaming" between carriers when still in its home carrier's footprint. This issue can be resolved but it requires a carrier-to-carrier agreement to do so.

CERTIFICATE OF SERVICE

I, Jane Aguilard, hereby certify that on this 25th day of January, 2001, a copy of the foregoing Erratum to Reply Comments of Southern LINC[®] in CC Docket No. 94-102 was served as indicated on each of the following:

Via Courier

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January 25, 2001
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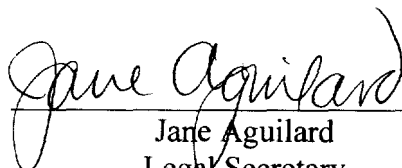
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